

# **Exhibit A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.

-----X  
MOLLY M. REID,

Date Filed:

Plaintiff,

Plaintiff designates:

-against-

BRONX County as the place of  
trial

ANTHONY D. BLAIR and BLACKWATER  
ENTERPRISES INC.,

The basis of venue is:

Location of Occurrence

Defendants.

**S U M M O N S**

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Plaintiff's address:

4257 Barnes Avenue,  
Bronx, NY 10466

To the above named Defendant(s):

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorney, within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Bronx, New York  
October 14, 2020

**PEÑA & KAHN, PLLC**  
Attorneys for Plaintiff  
Office & P. O. Address  
1250 Waters Place, Ste. 901  
Bronx, New York 10461  
(718) 585-6551  
**Our File No.: 08749**

By: 

ANDREW DAVIDOW

Defendants' Addresses:

ANTHONY D. BLAIR  
3287 Chinaberry Ln  
Snellville, GA 30039

BLACKWATER ENTERPRISES INC.  
342 Gates Rd.  
Woodbury, GA 30293

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.:

-----X  
MOLLY M. REID,

**VERIFIED COMPLAINT**

Plaintiff,

-against-

ANTHONY D. BLAIR and BLACKWATER  
ENTERPRISES INC.,

Defendants.

-----X

Plaintiff, by her attorneys, PEÑA & KAHN, PLLC, complaining of the defendants, all upon information and belief, respectfully states and alleges as follows:

1. That at all times herein mentioned, the plaintiff was and still is a resident of the County of Bronx, and State of New York.
2. That at all times herein mentioned, the occurrence that gave rise to this action occurred in the County of Bronx, and State of New York.
3. That at all times herein mentioned, defendant BLACKWATER ENTERPRISES INC. (hereinafter referred to as "BLACKWATER") was a domestic corporation duly organized and existing under and by the virtues of the laws of the State of New York.
4. That at all times herein mentioned, defendant BLACKWATER was a foreign corporation duly authorized to do business within the State of New York.
5. That at all times herein mentioned, defendant BLACKWATER was a partnership transacting business in the State of New York.
6. That at all times herein mentioned, defendant BLACKWATER was a business entity doing business within the State of New York.

7. That on July 11, 2019, the defendant BLACKWATER ENTERPRISES INC. was the registered owner of a certain motor vehicle bearing Georgia License Plate No. C9266A (said vehicle hereinafter referred to as “BLACKWATER VEHICLE”).
8. That on said date, the defendant BLACKWATER ENTERPRISES INC. was the title owner of the BLACKWATER VEHICLE.
9. That on said date, the defendant ANTHONY D. BLAIR was the registered owner of the BLACKWATER VEHICLE.
10. That on said date, the defendant ANTHONY D. BLAIR was the title owner of the BLACKWATER VEHICLE.
11. That on said date, the defendant ANTHONY D. BLAIR operated the BLACKWATER VEHICLE.
12. That on said date, the defendant ANTHONY D. BLAIR operated the BLACKWATER VEHICLE with permission and consent of BLACKWATER ENTERPRISES INC. as owner of the BLACKWATER VEHICLE.
13. That on said date, the defendant ANTHONY D. BLAIR operated the BLACKWATER VEHICLE in the course of their employment with BLACKWATER ENTERPRISES INC. as owner of the BLACKWATER VEHICLE.
14. That all times herein mentioned, the plaintiff was seated in the driver’s seat of a parked vehicle.
15. That on July 11, 2019, at approximately 12:20 a.m., the defendant ANTHONY D. BLAIR operated the BLACKWATER VEHICLE along and upon East 176th Street at or near its intersection with Bathgate Avenue in the County of Bronx, and State of New York.

16. That at said time and place, the vehicle being operated and controlled by the defendant came into contact with the plaintiff's vehicle.
17. That as a result of the happening of the said occurrence complained of, plaintiff sustained grievous personal injuries and attendant damage.
18. That the said occurrence and the injuries resulting therefrom and sustained by the plaintiff were caused by reason of the negligence and carelessness of the defendants without any fault or negligence on the part of the plaintiff contributing thereto.
19. That the defendants were negligent in failing to keep their vehicle under proper control; in operating vehicle at an excessive rate of speed under the existing traffic conditions; in failing to keep said vehicle at a safe and proper distance from the plaintiff's vehicle in failing to make use of a proper horn or other signal or warning device; in operating said vehicle at an improper rate of speed on the said roadway; in failing to yield to the right of way; in disregarding the traffic conditions then and there existing; in disregarding a traffic device; in causing, allowing and permitting their vehicle to come into contact with the plaintiff's vehicle; in failing to keep a proper lookout; in failing to give any signal or warning of approach; in failing to make proper use of the brakes or braking equipment; and in failing to make proper use of the steering mechanism.
20. That as a result of the foregoing, the plaintiff suffered a "serious injury" as defined by §5102, Subd. (d) of the Insurance Law of the State of New York.
21. That by reason thereof, the plaintiff is entitled to recover for non-economic loss and for such economic losses as are not included within the definition of "basic economic loss" as set forth in §5102 Subd. (a) of the Insurance Law of the State of New York.

22. That the plaintiff is a "covered person" within the definition of, and as defined in, §5102, Subd. (j) of the Insurance Law of the State of New York.
23. That one (1) or more of the exceptions set forth in CPLR Section 1602 apply to this action.
24. That by reason of the foregoing, the plaintiff sustained serious personal injuries to various parts of the body; suffered and will continue to suffer great pain and anguish in body and mind; that plaintiff has received necessary hospital and medical attention by reason of the injuries sustained by plaintiff; that plaintiff has necessarily received, is receiving and will continue to receive medical care and treatment in connection with the injuries suffered by plaintiff, and in connection with which expenses have, are and will continue to be incurred; that plaintiff has been greatly incapacitated and has been unable to attend to plaintiff's usual duties as plaintiff had theretofore done, and plaintiff's injuries are permanent, protracted and disabling in nature, and all the plaintiff's damages as against the defendants are a sum which exceeds the jurisdictional limits of all lower courts of the State of New York.

**WHEREFORE**, plaintiff demands judgment against the defendants in an amount which exceeds the jurisdictional limits of the lower courts of the State of New York, and in an amount which satisfies diversity jurisdiction of the Federal Courts pursuant to 28 USCA § 1441 and 1331, together with the costs and disbursement of this action.

Dated: Bronx, New York  
October 14, 2020

**PEÑA & KAHN, PLLC**  
Attorneys for Plaintiff  
Office & P. O. Address  
1250 Waters Place, Ste. 901  
Bronx, New York 10461  
(718) 585-6551  
**Our File No.: 08749**

By: 

\_\_\_\_\_  
ANDREW DAVIDOW



ATTORNEY VERIFICATION

Andrew Davidow, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms under the penalties of perjury that:

He is one of the attorneys for Plaintiff in the above entitled action. That he has read the foregoing **COMPLAINT** and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

**The reason this Verification is made by deponent and not by Plaintiff personally, is that in light of the Global Covid-19 Pandemic and New York State Executive Order 202.6, et seq. regarding a directive to "stay at home", Plaintiff(s) herein, despite being a resident of the county in which Plaintiff's Attorneys maintain their office, Plaintiff is legally restricted from personally verifying this document. Accordingly, it is being verified by Plaintiff's counsel.**

The source of deponent's information and the grounds of his belief are communication, papers, reports and investigation contained in the file.

Dated: Bronx, New York  
October 14, 2020



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Andrew Davidow, Esq.

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

**Index No.**

**MOLLY M. REID,**

**Plaintiff,**

**-against-**

**ANTHONY D. BLAIR and BLACKWATER ENTERPRISES INC.,**

**Defendants.**

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**SUMMONS AND VERIFIED COMPLAINT**

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**PEÑA & KAHN, PLLC  
Attorneys for Plaintiff  
Post Office Address and Telephone  
1250 Waters Place, Suite 901  
BRONX, New York 10461  
Tel: (718) 585-6551  
Fax: (718) 585-6618**

**Pursuant to 22NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the Courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous**



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**ANDREW DAVIDOW, ESQ.  
PEÑA & KAHN, PLLC**

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**Dated: October 14, 2020**